

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL GRAHAM; ALEXUS DIGGS; and
HEATHER CONNOLLY, *on behalf of themselves*
and all others similarly situated,
Plaintiffs-Petitioners,

20-cv-496

v.

ALLEGHENY COUNTY; and ORLANDO
HARPER, *Warden of Allegheny County Jail,*
Defendants-Respondents.

Defendants' Response to Motion for Preliminary Injunction

1. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.
2. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.
3. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.
4. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.
5. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.

6. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.

7. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.

8. Denied. The Allegheny County Jail has taken and is taking reasonable measures to protect its inmates and employees from COVID-19.

WHEREFORE, Allegheny County and Orlando Harper respectfully demand that the Court deny Plaintiffs' Motion for a Preliminary Injunction.

Respectfully submitted,

/s/John A. Bacharach

Allegheny County Assistant Solicitor
PA ID 19665
Allegheny County Law Department
300 Fort Pitt Commons Building
445 Fort Pitt Boulevard
Pittsburgh, PA 15219
(412) 350-1150